

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie Nelson, Tannen Maury, Stephen Muren, and The Communications Workers of America, *On behalf of themselves and other similarly situated individuals*,

Court File No. 20-cv-01302
(WMW/DTS)

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his individual and official capacity*;
Minneapolis Police Lieutenant Robert Kroll, *in his individual and official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his individual and official capacity*, Minnesota State Patrol Colonel Matthew Langer, *in his individual and official capacity*; and John Does 1-4, *in their individual and official capacities*,

Defendants.

PLAINTIFFS' AMENDED EXHIBIT LIST

PRESIDING JUDGE					PLAINTIFF'S ATTORNEY	DEFENDANT'S ATTORNEY
Wilhelmina M. Wright						
TRIAL DATE (S)					COURT REPORTER	COURTROOM DEPUTY
July 28, 2021						
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1.					Photograph taken by Chris Tuite [Plaintiffs000211]	
2.					Excerpt from video taken by Jon Farina [Plaintiffs000367]	
3.					April 14, 2021 Instagram post by Chris Tuite [Plaintiffs000245 – 55]	

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4.					April 17, 2021 Instagram post by Chris Tuite [Plaintiffs000289 – 99]
5.					Photograph of Chris Tuite [StateDef0000148]
6.					Photograph of Chris Tuite's press credential and driver's license (STATEDEF0000149 / CONFIDENTIAL)
7.					Clip of Ed Ou video taken on May 30, 2020, Minneapolis. [PLAINTIFF000301]
8.					Ed Ou video taken on April 13, 2021, Brooklyn Center. [PLAINTIFF000097]
9.					Color photograph of Ed Ou's mask. [PLAINTIFF000300]
10.					Color photograph of Ed Ou. [PLAINTIFF000098]
11.					Color photograph of Ed Ou. [PLAINTIFF000106]
12.					Color photograph of Ed Ou. [PLAINTIFF000302]
13.					Ed Ou Tweet dated June 2, 2020 [Plaintiffs000368]: https://twitter.com/edouphoto/status/1267981849537609728?s=20
14.					Long Ed Ou video taken on May 30, 2020 [Plaintiffs000370]. https://drive.google.com/file/d/1Wm5B7XOAUrJcGsex3vgVkeFz1cfpiq/view?usp=sharing
15.					The Office of Internal Affairs memo dated December 29, 2020 re: Complaint. [STATEDEF0000635 – 636 / AEO]
16.					Department of Public Safety Formal Complaint dated April 19, 2021. [STATEDEF0000699 / AEO]
17.					City of Minneapolis Complaint. [STATEDEF0000704 – 705 / AEO]
18.					Department of Public Safety Formal Complaint dated June 19, 2020. [STATEDEF0000706 / AEO]
19.					Department of Public Safety Statement dated September 4, 2020. [STATEDEF0000710 – 719 / AEO]
20.					Email chain regarding Complaint. [STATEDEF0000723 – 726 / AEO]
21.					Department of Public Safety Formal Complaint. [STATEDEF0000729 – 738 / AEO]
22.					Email chain regarding Complaint. [STATEDEF0000739 – 740 / AEO]

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES
23.					Email from Leita Walker to Paul Schnell, John Harrington and Matthew Langer re: Letter from Media Regarding Law Enforcement with attachment. [DOC0000005]
24.					Email chain between Leita Walker and Paul Schnell regarding Carolyn Sung Questions. [DOC0000008]
25.					Email chain between Leita Walker and Paul Schnell regarding Follow-up. [DOC0000014]
26.					Email from Leita Walker to Paul Schnell regarding Vice Media Journalist Arrests with attachment. [DOC0000017]
27.					Email chain between Matt Sokol and Melissa Eberhart dated April 17, 2021 regarding TRO. [STATEDEF0000015 – 16]
28.					Email between Liz Kramer and Karl Procaccini dated April 17, 2021 regarding Fed. Cr. TRO – For Distribution to Operation Safety Net. [STATEDEF0000043 – 44]
29.					Email from Melissa Eberhart dated April 17, 2021 re: Statement from Minnesota State Patrol on Recent Temporary Restraining Order. [STATEDEF0000066 – 68]
30.					Email chain with Bruce Gordon dated April 16, 2021 regarding TRO. [STATEDEF0000069 – 70]
31.					Email chain dated April 19, 2021 regarding Leita Walker – Follow-up on Letter. [STATEDEF0000411 – 412 / AEO]
32.					Letter from Leita Walker dated April 17, 2021. [STATEDEF0000432 – 440 / AEO]
33.					Email chain between Bruce Gordon and John Elder dated April 6, 2021 regarding Very Rough Draft of Invitation. [STATEDEF0000506]
34.					Email chain dated September 30, 2020 regarding Complaint. [STATEDEF0000682 – 686 / AEO]
35.					Declaration of Bruce Gordon (with exhibits).
36.					Declaration of John Harrington.
37.					Declaration of Joseph Dwyer (with exhibits – some AEO).
38.					Declaration of Kathryn Landrum (with exhibits).
39.					Declaration of Colonel Matthew Langer.

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40.					Declaration of Lieutenant Colonel Rochelle Schrofer.
41.					Schrofer Declaration Exhibit 1 [000001 – 000004].
42.					Minnesota State Patrol Investigation Notes. [STATEDEF0000526]
43.					Department of Public Safety Statement dated December 16, 2020. [STATEDEF0000541 – 550 / AEO]
44.					Minnesota State Patrol Field Report dated June 17, 2020. [STATEDEF0000555 – 560 / AEO]
45.					Department of Public Safety Statement dated January 14, 2021. [STATEDEF0000569 – 574 / AEO]
46.					Minnesota State Patrol Field Report dated May 28, 2020. [STATEDEF0000587 – 592 / AEO]
47.					Department of Public Safety Statement dated December 22, 2020. [STATEDEF0000624 – 628 / AEO]
48.					Department of Public Safety Statement dated January 21, 2021. [STATEDEF0000637 – 645 / AEO]
49.					Department of Public Safety Statement dated December 22, 2020. [STATEDEF0000654 – 659 / AEO]
50.					Department of Public Safety Statement dated December 3, 2020. [STATEDEF0000661 – 671 / AEO]
51.					Department of Public Safety Statement dated December 22, 2020. [STATEDEF0000693 – 698 / AEO]
52.					The Office of Internal Affairs memo dated April 20, 2021. [STATEDEF0000727 – 728 / AEO]
53.					Minnesota State Patrol Policy regarding Media – Requests and Information. [STATEDEF0000743 – 744]
54.					Minnesota Department of Public Safety Administrative Policy regarding Media. [STATEDEF0000745 – 747]
55.					Emergency Executive Order 20-65 [Plaintiffs000378].

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56.					Media Photograph dated April 16, 2021. [STATEDEF0000091]
57.					Media Photograph dated April 16, 2021. [STATEDEF0000092]
58.					Media Photograph dated April 16, 2021. [STATEDEF0000093 / Confidential]
59.					Media Photograph dated April 16, 2021. [STATEDEF0000094]
60.					Media Photograph dated April 16, 2021. [STATEDEF0000095]
61.					Department of Public Safety Statement dated January 6, 2021. [STATEDEF0000512 – 520 / AEO]
62.					Emergency Executive Order 21-18 [Plaintiffs000379].
63.					Complaint dated May 25, 2021.
64.					Ryan Raiche Video [Plaintiffs000375]: https://www.facebook.com/RyanRaiche/videos/2882143978738897/
65.					Carlos Gonzalez April 12, 2021 Video [Plaintiffs000371]: https://twitter.com/CarlosGphoto/status/1381794769182023682
66.					Harry Colbert April 14, 2021 Video [Plaintiffs000372]: https://www.facebook.com/harry.colbert/videos/10159284117185135/?d=n
67.					Unicorn Riot April 14, 2021 Video [Plaintiffs000373]: https://unicornriot.ninja/2021/police-break-equipment-shoot-beat-and-detain-press/
68.					Omar Jimenez May 29, 2020 Video [Plaintiffs000374]: https://www.youtube.com/watch?v=ftLzQefpBvM
69.					Tom Aviles's May 20, 2020 Video [Plaintiffs000376]: https://minnesota.cbslocal.com/2020/05/30/wcco-photojournalist-tom-aviles-arrested-in-south-minneapolis/
70.					Unicorn Riot April 13, 2020 Video [Plaintiffs000377]: https://youtu.be/BIQP0qEmOW8

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71.					Background on Draft Model Policy on Public Assembly / First Amendment Activity from July 22, 2021 POST Board Meeting.

Dated: July 27, 2021

/s/ *Pari I. McGarraugh*

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